



December 8, 2008

Reply to Attn of:

140

TO: Distribution

FROM: 140/Chief Counsel

SUBJECT: Determination Regarding Attendance of NASA Employees at Sigma
Space Reception

On the evening of Thursday, December 11, 2008, Sigma Space Corporation is hosting a holiday reception at the Greenbelt Marriott in Greenbelt, Maryland. Sigma Space is an aerospace contractor that produces remote sensing instrumentation for NASA and other Federal agencies.

Approximately 100 guests are expected to attend the reception, including individuals from the aerospace industry, Federal agencies, including NASA and NOAA, and Maryland state government officials. The estimated cost per person of the reception is approximately \$40. Attendance at the reception will allow NASA employees an opportunity to discuss with other guests issues concerning NASA's space and earth science programs.

Based on the above, I find that the event meets the requirements of a "widely attended gathering" as defined in 5 CFR 2635.204(g). I further find that there is an Agency interest in having NASA employees attend this event. Accordingly, NASA employees whose duties do not substantially affect Sigma Space may accept an invitation for free attendance to the reception for themselves and their spouses or guests.

NASA employees whose duties substantially affect Sigma Space, for instance by way of procurement duties, should seek an individual determination regarding participation in this event from their local ethics counselor.

A handwritten signature in black ink, appearing to read "Robert M. Stephens".

Robert M. Stephens